

1 Jeffrey S. Facter (State Bar No. 123817)
2 Jiyoun Chung (State Bar No. 226900)
3 SHEARMAN & STERLING LLP
4 525 Market Street, Suite 1500
5 San Francisco, CA 94105
6 Telephone: (415) 616-1100
7 Facsimile: (415) 616-1199
8 Email: jfacter@shearman.com
9 jiyoun.chung@shearman.com

10 Attorneys for Defendants ATI Technologies Inc.,
11 ATI Technologies Systems Corp., ATI Research
12 Silicon Valley Inc., and ATI Research, Inc.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 RHONDA WADE,

17 Plaintiff,

18 v.

19 ATI TECHNOLOGIES, INC., et al.,

20 Defendants.

Case No.: CV 06-03885 JW RS

STIPULATION AND ~~[PROPOSED]~~
ORDER RE CONSOLIDATION

Judge: Hon. James Ware

1 WHEREAS, the above-entitled action was transferred to this District on or about
2 June 22, 2006 from the United States District Court for the Western District of Tennessee ("the
3 Tennessee District Court");

4 WHEREAS, there is currently pending in this District before the Honorable James
5 Ware a consolidated action entitled In re ATI Tech. HDCP Litigation, Case No. 5:06-CV-01303-
6 JW ("the Consolidated Action");

7 WHEREAS, this Court issued an Order re: Case Management in the Consolidated
8 Action on April 18, 2006 ("the Case Management Order"), which provided that "[e]ach new case
9 that is related to the Consolidated Action which is filed in, removed to or transferred to this Court,
10 shall be consolidated with the Consolidated Action";

11 WHEREAS, the Order Granting Joint Motion for Change of Venue issued by the
12 Tennessee District Court on June 13, 2006 makes reference to the Consolidated Action and the
13 Case Management Order, specifically providing that "[t]he parties in the instant case agree that
14 given the Case Management Order . . . , it is in the interest of justice . . . , that this action be
15 transferred to the United States District Court for the Northern District of California, San Jose
16 Division to be consolidated with the Consolidated Action currently pending before Judge Ware";

17 WHEREAS, the parties to this action are thus in agreement that this case is
18 "related" to the Consolidated Action pursuant to Civil L.R. 3-12 and should be consolidated with
19 the Consolidated Action, and Co-Lead Counsel for plaintiffs in the Consolidated Action are also in
20 agreement to the same;

21 NOW THEREFORE, the parties in the above-entitled action as well as the
22 Consolidated Action, by and among their undersigned counsel, hereby jointly stipulate and request
23 the Court to order as follows:

24 1. This action, Wade v. ATI Tech., Inc. et al., Case No. CV 06-03885 JW RS,
25 is hereby consolidated with the Consolidated Action, In re ATI Tech. HDCP Litigation, Case No.
26 5:06-CV-01303-JW, which is currently pending in this District before the Honorable James Ware,
27 and the Clerk of the Court shall make the appropriate change on the docket.

1 IT IS SO STIPULATED.

2 Dated: July 17, 2006

SHEARMAN & STERLING LLP
Jeffrey S. Facter
Jiyoun Chung

4 By: /s/ Jiyoun Chung
Jiyoun Chung

5 525 Market Street, Suite 1500
6 San Francisco, CA 94105
7 Telephone: (415) 616-1100
Facsimile: (415) 616-1199

8 Attorneys for Defendants ATI Technologies Inc.,
9 ATI Technologies Systems Corp., ATI Research
Silicon Valley Inc., and ATI Research, Inc.

10
11 Dated: July 17, 2006

THE MASON LAW FIRM, P.C.
Alexander E. Barnett

12 One Pennsylvania Plaza, Suite 4632
13 New York, NY 10119
14 Telephone: (212) 362-5770
Facsimile: (917) 591-5227

15 THE MASON LAW FIRM, P.C.
16 Gary E. Mason
Nicholas A. Migliaccio

17 1225 19th Street, NW, Suite 500
18 Washington, D.C. 20038
19 Telephone: (202) 429-2290
Facsimile: (202) 429-2294

20 GLASSMAN, EDWARDS WADE
& WYATT, P.C.
21 B.J. Wade

22 By: /s/ B.J. Wade (by J. Chung with permission)
B.J. Wade

23 26 North Second Street
24 Memphis, TN 38103
25 Telephone: (901) 527-4673
Facsimile: (901) 527-0940

26 Attorneys for Plaintiff Rhonda Wade, on behalf of
herself and all others similarly situated

27 //

28 //

1 Dated: July 17, 2006

KAMBER & ASSOCIATES, LLC
Scott A. Kamber

19 Fulton Street, Suite 400
New York, NY 10038
Telephone: (877) 773-5469
Facsimile: (212) 202-6364

PARISI & HAVENS LLP
David C. Parisi

7 By: 
David C. Parisi


15233 Valleyheart Drive
Sherman Oaks, CA 91403
Telephone: (818) 990-1299
Facsimile: (818) 501-7852

Co-Lead Counsel for Plaintiffs in In re ATI Tech.
HDCP Litigation, Case No. 5:06-CV-01303-JW

ORDER

15 IT IS SO ORDERED.

16 Dated: July 31, 2006


THE HONORABLE JAMES WARE
UNITED STATES DISTRICT COURT JUDGE